

**WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP**

Don Springmeyer  
Nevada Bar No. 1021  
Bradley S. Schrager  
Nevada Bar No. 10217  
Justin C. Jones  
Nevada Bar No. 8519  
3556 E. Russell Road, Second Floor  
Las Vegas, Nevada 89120  
(702) 341-5200/Fax: (702) 341-5300  
dspringmeyer@wrslawyers.com  
bschrager@wrslawyers.com  
jjones@wrslawyers.com

*Attorneys for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier  
Vazquez, Dennis Lloyd Hallman, Brandon Vera, Pablo  
Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury  
and Darren Uyenoyama*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, and Jon Fitch, on behalf  
of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship  
and UFC,

Defendant.

Lead Case No.: 2:15-cv-01045-RFB-(PAL)

Member Case Nos.:

2:15-cv-01046-RFB-(PAL)

2:15-cv-01055-RFB-(PAL)

2:15-cv-01056-RFB-(PAL)

2:15-cv-01057-RFB-(PAL)

**DECLARATION OF ROBERT C. MAYSEY**

And Related Consolidated Cases

I, Robert C. Maysey, Declare:

1. I am counsel for Plaintiffs in these consolidated matters, and I make this declaration in support of Plaintiffs' Notice of Protective Order. The following facts are based on my personal knowledge, and if necessary I could and would competently testify to them. I have represented MMA athletes in litigation for nearly ten years, and I have extensive knowledge of the MMA industry. Due to my extensive contacts with MMA fighters and knowledge of the industry, I am the principal client liaison

1 in this litigation. I have been involved in all aspects of researching and drafting the operative complaints,  
2 and have contributed to all pleadings, motions, and briefs filed in this antitrust litigation.

3 2. For many years, I have advocated for the formation of a Mixed Martial Arts Fighters  
4 Association (“MMAFA”). I founded the MMAFA in 2006 as means for athletes to establish  
5 improvements in the economic, physical and health and safety conditions for mixed martial artists,  
6 coaches and trainers, similar to the Major League Baseball Players’ Association and the Screen Actors  
7 Guild.

8 3. I do not own the MMAFA, nor do I “head” the MMAFA. I do not profit from the  
9 MMAFA. I am not a member of the MMAFA.

10 4. Attached hereto as Exhibit 1 is a true and correct copy of an article from the Internet Blog  
11 “Bloody Elbow” quoting UFC president Dana White concerning Reebok’s sponsorship of the UFC. It is  
12 available at the following web address: [http://www.bloodyelbow.com/2015/5/16/8615773/ufc-dana-](http://www.bloodyelbow.com/2015/5/16/8615773/ufc-dana-white-reebok-sponsors-brendan-schaub-tsn-off-the-record-michael-landsberg)  
13 [white-reebok-sponsors-brendan-schaub-tsn-off-the-record-michael-landsberg](http://www.bloodyelbow.com/2015/5/16/8615773/ufc-dana-white-reebok-sponsors-brendan-schaub-tsn-off-the-record-michael-landsberg).

14 I swear under the penalty of perjury and laws of the State of Nevada and the United States that the  
15 foregoing is true and correct.

16 /s/ Robert C. Maysey

17 Robert C. Maysey  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28